

May 29, 2019

Mr. Erick Ammon
Compliance Specialist
DEP - SCRO
909 Elmerton Avenue, Harrisburg, PA 17110

RECEIVED
MAY 31 2019
DEP SOUTH CENTRAL OFFICE
CLEAN WATER PROGRAM

Mr. Ammon,

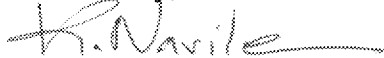
As a follow-up to the letter received by the Department on May 1, 2019, attached are our responses:

1. The spreadsheet for the average annual flow calculation does represent the sum of all daily flows and the number of days flow during the calendar year. Separate totals are provided to show operating day averages in addition to monthly totals.
2. We request a meeting with DEP to clarify the analyses required to determine compliance with the WQM Part II permit. No specific sampling interval or type was provided with the DMR example.
3. The plant instrumentation is not capable of recording peak hourly or peak instantaneous flows. With two pumps in operation, the maximum pumping rate observed by staff is 720 GPM or 1.036 MGD, which is less than the peak hourly flow rate limit of 1.380 MGD, and by extension less than the peak instantaneous of 1.500 MGD. The 2018 data shows the maximum daily organic loading was exceeded; however, the data is based on grab samples and cBOD analyses. Hanover will be installing a composite sampler to determine the true daily organic loadings and eliminate errors from the grab samples. We expect that the sampler will be installed and operational by July 2019.
4. No sampling interval was defined in the operating permit. Hanover has not been sampling the influent TN and TP to the process. Daily grab samples are being taken for cBOD, due to the turn-around time for the analysis and to aid in process control decisions. Daily grab samples for BOD5 have been initiated to quantify loadings.
5. No sampling interval was defined in the operating permit. Hanover will be conducting influent grab sampling for BOD5, TN and TP loadings of the cooling water starting in June 2019.
6. See comments in #4.
7. HFC did not accept any hauled in waste for the 2018 calendar year.
8. We believe that the information above provides more detail on the hydraulic loading to the IWTP and how Hanover plans to better quantify the organic loading to the IWTP.

We request a meeting with DEP to clarify the analyses required to determine compliance with the WQM Part II permit. We are managing the IWTP influent loadings in an effort to comply with the NPDES effluent limitations.

Please let us know if there are questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "K. Navile", with a horizontal line extending to the right.

for David K. Still
VP – Canning Operations
Hanover Foods Corporation